

# Exhibit 15

**RAMON K. QUICHOCHO, ESQ., FO243**  
**LAW OFFICES OF RAMON K. QUICHOCHO, LLC**  
**2<sup>nd</sup> Floor, V.S. Sablan Building, Chalan Piao**  
**P.O. Box 505621**  
**Saipan, MP 96950**  
**Telephone No. (670) 234-8946**  
**Facsimile No. (670) 234-8920**  
**Email: rayq@pticom.com**



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Elsa Duenas

A handwritten signature in black ink, appearing to be "Elsa Duenas".

**MICHAEL W. DOTTS, ESQ., F0150**  
**O'CONNOR BERMAN DOTTS & BANES**  
**2<sup>nd</sup> Floor, Nauru Building**  
**P.O. Box 501969**  
**Saipan, MP 96950**  
**Telephone No. (670) 234-5684**  
**Facsimile No. (670) 234-5683**  
**Email: attorneys@saipan.com**

*Attorneys for Plaintiff*  
**JOAQUIN Q. ATALIG**

**IN THE SUPERIOR COURT  
OF THE  
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

**JOAQUIN Q. ATALIG,**

**Plaintiff,**

**vs.**

**OKP (CNMI) CORPORATION,**  
**BRIAN M. CHEN, PRASADA REDDY**  
**GOLUGURI, PRAMUAN**  
**JAIPHAKDEE, WILAI PROMCHAI,**  
**COMMONWEALTH PORTS**  
**AUTHORITY, and REGINO M. CELIS,**  
**in his capacity as Acting Executive**  
**Director of the Commonwealth Ports**  
**Authority, and DOES 1-3,**

**Defendants.**

**CIVIL CASE NO. 06-0119(R)**

**ANSWER TO COUNTERCLAIM  
ASSERTED BY OKP CNMI  
CORPORATION**

COMES NOW Joaquin Q. Atalig, and in answer to the Counterclaim asserted by OKP CNMI Corporation, states as follows:

1. Counter-defendant admits the allegations contained in paragraphs 1, 3 and 4 of the Counterclaim.

2. With regard to paragraph 2, Counter-defendant admits that he is a United States citizen but denies that he resides on Saipan. Counter-defendant resides on Rota.

3. With regard to paragraphs 5, 6, 7 and 8, these paragraphs assert legal conclusions and legal arguments and on that basis are denied. To the extent documents are quoted in these paragraphs, the documents speak for themselves.

4. Counter-defendant denies the allegations made in paragraphs 9 and 10.

5. Counter-defendant denies that Counter-plaintiff is entitled to the relief paid for in the Counterclaim.

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### **AFFIRMATIVE DEFENSE**

For his Affirmative Defenses, Counter-defendant asserts:

- a. Counter-plaintiff has unclean hands.
- b. Counter-plaintiff has failed to mitigate damages.
- c. Counter-defendant asserts that the causes of action and factual assertions made in the underlying Second Amended Complaint preclude an award to Counter-defendant on the Counterclaim.

### **JURY DEMAND**

Plaintiff hereby demands a jury trial on the Counterclaim.

Dated: May 29, 2007

Respectfully submitted,

O'CONNOR BERMAN DOTTS & BANES

By:                     /s/                      
Michael W. Dotts, Esq.